

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Case No. 5:22-cv-0068-BO

YOLANDA IRVING, individually and as the  
natural parent and guardian of J.I., JUWAN  
HARRINGTON, CYDNEEA  
HARRINGTON, KENYA WALTON  
individually and as the natural parent and  
guardian of R.W., ZIYEL WHITLEY,  
DYAMOND WHITLEY, KAMISHA  
WHITLEY, NANETTA GRANT as the natural  
parent and guardian of Z.G., and  
EMANCIPATE NC, INC.,

*Plaintiffs,*

v.

THE CITY OF RALEIGH, Officer OMAR I.  
ABDULLAH, Sergeant WILLIAM ROLFE,  
Officer RISHAR PIERRE MONROE, Officer  
JULIEN DAVID RATTELADE, and Officer  
MEGHAN CAROLINE GAY, Officer DAVID  
MEAD, Officer JESUS ORTIZ, Officer KYLE  
PERRIN, Officer MICHEAL MOLLERE,  
Officer KYLE THOMPSON, Officer  
VINCENT DEBONIS, Officer DANIEL  
TWIDDY, Officer THOMAS WEBB, Officer  
DAVID MCDONALD, Officer DAVID  
GARNER, Chief of Police ESTELLA  
PATTERSON and City Manager MARCHELL  
ADAMS-DAVID, in their official capacities.

*Defendants.*

**PLAINTIFFS' MOTION TO FILE EXHIBITS UNDER SEAL  
PURSUANT TO LOCAL RULE 79.2**

NOW COME Plaintiffs, by and through undersigned counsel, and hereby respectfully move the Court to file Exhibits A-D of their Memorandum in Support of their Motion to Amend the Complaint under seal. In support of this motion, Plaintiffs state the following:

1. On March 7, 2023, Plaintiffs filed a motion to amend the complaint. ECF No. 185.
2. Plaintiffs also filed a memorandum in support of their motion. ECF No. 186.
3. Plaintiffs attached deposition testimony to their memorandum of support as exhibits A-F. *Id.*
4. These exhibits were included to demonstrate the basis for the amendments to the complaint.
5. Exhibits A-D are portions of Officer Rishar Monroe's deposition transcript.
6. Officer Monroe was deposed on January 31, 2023, and the parties received his transcript on February 14, 2023.
7. The Consent Protective Order agreed to by the parties states that deposition transcripts shall be treated as confidential for a period of thirty days after their receipt. ECF No. 84.
8. Because we have not yet passed the thirty day mark, Plaintiffs respectfully request permission to file these exhibits under seal.

WHEREFORE, Plaintiffs respectfully request that this Court (1) enter an order permitting Plaintiffs to file under seal Exhibits A-D of their Memorandum in Support of their Motion to Amend the Complaint, and (2) permitting any party to move to unseal the Exhibits at a future date.

This the 8th day of March 2023

Respectfully,



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Served on all parties: Via ECF